

MOSS & KALISH, PLLC

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

_____)	
In re:)	Case No. 12-12020 (MG)
)	
RESIDENTIAL CAPITAL, LLC, <i>et al.</i> ,)	Chapter 11
)	
Debtors.)	Jointly Administered
_____)	

**JOINDER OF FEDERAL HOME LOAN MORTGAGE
CORPORATION TO FIVE MOTIONS *IN LIMINE***

Federal Home Loan Mortgage Corporation in conservatorship (“Freddie Mac”),¹ by and through its undersigned counsel, hereby joins (the “Joinder”) the (i) *Motion In Limine to Preclude the Testimony of Jeffrey A. Lipps Regarding the Debtors' 9019 Motion (In Limine Motion One)* [ECF No. 4539], (ii) *Motion In Limine to Preclude the Testimony of S.P. Kothari Regarding the Debtors' 9019 Motion (In Limine Motion Two)* [ECF No. 4541], (iii) *Motion In Limine to Preclude the Testimony of Allen M. Pfeiffer Regarding the Debtors' 9019 Motion (Motion in Limine Three)* [ECF No. 4546], (iv) *Motion In Limine to Preclude the Trustees from Offering Any Evidence of Their Reliance on Counsel in Support of Debtors' 9019 Motion (In*

¹ On September 6, 2008, the Director of the Federal Housing Finance Agency (the “FHFA” or the “Conservator”) placed Freddie Mac into conservatorship, pursuant to express authority granted under the Housing and Economic Recovery Act of 2008, to preserve and conserve Freddie Mac’s assets and property. As Conservator, FHFA immediately succeeded to “all rights, titles, powers and privileges” of Freddie Mac. *See* 12 U.S.C. § 4617(b)(2)(A)(i). This Joinder does not constitute submission to this Court’s jurisdiction by the FHFA.

Limine Motion Four) [ECF No. 4548], and (v) *Motion In Limine to Preclude Evidence on the Debtors' 9019 Motion Concerning the Negotiations Leading Up to the FGIC Settlement Agreement and the Conclusory Statements Offered by the FGIC Trustees and Others About the Nature of Those Negotiations (In Limine Motion Five)* [ECF No. 4545] (items (i)-(v), *supra*, collectively, the “Willkie Motions *in Limine*”).

JOINDER

1. Freddie Mac is a major holder of various tranches of residential mortgage-backed securities held in nine ResCap securitization trusts. The payment of principal and interest on the securities held in the trusts is insured under approximately sixty insurance policies issued by Financial Guaranty Insurance Company.

2. Freddie Mac hereby joins with, and adopts the arguments advanced in, the Willkie Motions *in Limine* as if fully set forth herein.

Dated: August 8, 2013

Respectfully submitted,

MOSS & KALISH, PLLC

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